

Mr. James F. Lang  
Fowler Specialty Packaging, Inc.  
407 South Adeway Road, P. O. Box 692  
Fowler, IN 47944

Re: 007-14563  
Third Administrative Amendment to  
Part 70 No.: T 007-7645-00010

Dear Mr.Lang:

Fowler Specialty Packaging, Inc. was issued a permit on March 30, 1998 for the operation of stationary paper and allied products printing facility. A letter requesting changes to this permit was received on July 2, 2001. Pursuant to the provisions of 326 IAC 2-7-11 an administrative amendment to this permit is hereby approved as described in the attached Technical Support Document.

The modifications relate to the operation of a replacement of Tail Press #54 and an adjustment to Tail Press #53.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

MDM

cc: File - Benton County  
U.S. EPA, Region V  
Benton County Health Department  
Air Compliance Section Inspector - Jim Thorpe  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT**

**Fowler Specialty Packaging, Inc.  
407 South Adeway Road  
Fowler, Indiana 47944**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T007-7645-00010	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: March 30, 1998

First Significant Permit Modification No. 007-9795, issued on June 2, 1999.  
First Administrative Amendment No. 007-11025, issued on August 23, 1999.  
Second Minor Permit Modification No. 007-12289, issued on August 21, 1999.  
Second Administrative Amendment No. 007-14433, issued on July 17, 2001.

Third Administrative Amendment: 007- 14563	Pages Affected: 5, 38a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 14, 2001

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), and presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

---

The Permittee owns and operates a stationary paper and allied products printing operation.

Responsible Official: Richard L. Happ  
Source Address: 407 South Adeway Road, Fowler, Indiana 47944  
Mailing Address: P. O. Box 692, Fowler, Indiana 47944  
SIC Code: 2671  
County Location: Benton  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD Rules

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

---

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) rotogravure - printing press, seven chamber/color utilizing solvent based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of twenty-eight and twenty-five hundredths (28.25) inches, exhausting to two (2) stacks (S<sub>5</sub> and S<sub>8</sub>);
- (2) One (1) flexographic printing press, identified as press No. 3, utilizing water based inks, with a maximum line speed of two-hundred fifty (250) feet per minute and a maximum print width of twenty-two (22) inches, exhausting to two (2) stacks (S<sub>2</sub> and S<sub>3</sub>);
- (3) One (1) flexographic printing press, identified as press No. 4, utilizing water based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of thirty-one (31) inches, exhausting to two (2) stacks (S<sub>2</sub> and S<sub>3</sub>);
- (4) One (1) flexographic printing press, identified as press No. 5, utilizing water based inks, with a maximum line speed of five-hundred (500) feet per minute and a maximum print width of forty-six (46) inches, exhausting to one (1) stack (S<sub>4</sub>); and
- (5) One (1) flexographic printing press, identified as press No. 6, with a maximum line speed of one thousand (1,000) feet per minute and a maximum print width of 20.0 inches; and exhausting to one (1) stack (S<sub>17</sub>).
- (6) Eleven (11) flexographic tail printers, identified as TP-48 and TP-49 and tuber machines No. 50 through 53, 55 through 58, utilizing water based inks, with a maximum line speed of two hundred fifty (250) feet per minute and a maximum print width of twenty-eight (28) inches, identified as tuber machine No. 54, utilizing water based inks, with a maximum line speed of two hundred fifty (250) feet per minute and a maximum print width of twenty-four (24) inches, exhausting to the plant atmosphere.

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

---

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6; and
- (2) One (1) 5.23 million British thermal units per hour (mmBtu/hr) natural gas or fuel oil No. 2 fired boiler.

## SECTION D.6

## FACILITY OPERATION CONDITIONS

Eleven (11) flexographic tail printers, identified as TP-48 and TP-49 and tuber machines No. 50 through 53, 55 through 58, utilizing water based inks, with a maximum line speed of two hundred fifty (250) feet per minute and a maximum print width of twenty-eight (28) inches, identified as tuber machine No. 54, utilizing water based inks, with a maximum line speed of two hundred fifty (250) feet per minute and a maximum print width of twenty-four (24) inches, exhausting to the plant atmosphere.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.6.1 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]

- (a) The potential volatile organic compound emissions from each of the nine (9) flexographic tail printers, identified as tuber machines No. 50 through No. 58, is less than 25 tons per year. Therefore, 326 IAC 8-5-5 does not apply.
- (b) Any change or modification to the nine (9) flexographic tail printers, identified as tuber machines No. 50 through No. 58 that would lead to an increase in any criteria pollutant emissions, as specified in 326 IAC 2-1 must be approved by the Office of Air Management (OAM) before such change or modification can occur.

### Compliance Determination Requirements

#### D.6.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.6.3 Monitoring

Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for an Administrative Amendment to a Part 70 Operating Permit**

#### **Source Background and Description**

<b>Source Name:</b>	<b>Fowler Specialty Packaging, Inc.</b>
<b>Source Location:</b>	<b>407 South Adeway Road, Fowler, Indiana 47944</b>
<b>County:</b>	<b>Benton</b>
<b>SIC Code:</b>	<b>2671</b>
<b>Operation Permit No.:</b>	<b>007-7645-00010</b>
<b>Operation Permit Issuance Date:</b>	<b>March 30, 1998</b>
<b>Permit Modification No.:</b>	<b>007-14563-00010</b>
<b>Permit Reviewer:</b>	<b>Madhurima D. Moulik</b>

The Office of Air Quality (OAQ) has reviewed an amendment application from Fowler Specialty Packaging Inc. relating to changes to two presses. Tail Press # 53 will change from a one-color press to a two-color press. Tail Press # 54 will be replaced. The printing width capacity will decrease from 28 inches to 24 inches.

#### **Justification for the Amendment**

The emissions from this change are less than the exemption levels listed in rule 326IAC 2-1.1-3. This rule also exempts the source from obtaining a modification for this type of change. Therefore, an administrative amendment is required.

#### **Existing Approvals**

The source was issued a Part 70 Operating Permit 007-7645-00010 on March 30, 1998. The source has since received the following:

- (a) First Significant Permit Modification No.: 007-9795, issued on June 2, 1999;
- (b) First Minor Permit Modification No.: 007-10544, pending;
- (c) First Administrative Amendment No.: 007-11025, issued on August 23, 1999;
- (d) Second Minor Permit Modification No.: 007-12289, issued on August 21, 1999; and
- (e) Second Administrative Amendment No: 007-14433, issued on July 17, 2001.

#### **Enforcement Issue**

There are no enforcement actions pending.

#### **Stack Summary**

There are no stacks for this amendment. These tail printers exhaust to the plant atmosphere.

## Recommendation

The staff recommends to the Commissioner that the Administrative Amendment be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 2, 2001.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations.

## Potential To Emit of the Amendment

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	-
PM-10	-
SO <sub>2</sub>	-
VOC	3.92
CO	-
NO <sub>x</sub>	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

## County Attainment Status

The source is located in Benton County.

Pollutant	Status ( <b>attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment</b> )
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>2</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Benton County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### **Federal Rule Applicability**

- (a) The flexographic printers # 53 and 54 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, 40 CFR 60.430, Subpart QQ because they are flexographic printers not rotogravure printers.
- (b) There are no New Source Performance Standards (NSPS) (40 CFR 60 and 326 IAC 12) applicable to this source.
- (c) National Emissions Standards for Hazardous Air Pollutants (NESHAP) Subpart KK - National Emission Standards for the Printing and Publishing Industry will apply. This applies to wide web flexographic printing presses. A wide web flexographic printing press is defined as a press capable of printing greater than 18 inches in width. These presses are capable of printing at 24 and 28 inches in width.

Under 40 CFR 63.829(d), the owner or operator of each facility shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

Under 40 CFR 63.830(b)(1), each owner or operator of an affected source subject to this subpart shall submit the reports specified in paragraph (b)(1) to the Administrator:

- 1) An initial notification required in Section 63.9(b).
  - i) Initial notification for existing sources shall be submitted no later than one year before the compliance date specified in Section 63.9(b).
  - ii) Initial notification for new and reconstructed sources shall be submitted as required by 63.9(b).
  - iii) For the purposes of this subpart, a Title V or part 70 permit application may be used in lieu of the initial notification required under 63.9(b) provided the same information is contained in the permit application as required by 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.
  - iv) Permit applications shall be submitted by the same due dates as those specified for the initial notifications.
- (d) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 20 and 40 CFR Part 61, 63) applicable to this source.

### **State Rule Applicability - Entire Source**

#### **326 IAC 2-2 (Prevention of Significant Deterioration)**

This source is a major source. However, the modification to this source is not significant, since the potential emissions of VOC are not greater than 40 tons per year.

#### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

### State Rule Applicability - Individual Facilities

#### 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of these flexographic printing presses will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

#### 326 IAC 8-1-6

The potential VOC emissions from these two presses will each be less than 25 tons per year, therefore, this rule will not apply.

#### 326 IAC 8-5-5

The flexographic printers #53 and 54 are not subject to the requirements of 326 IAC 8-5-5 (Graphic Arts operations) because the potential emissions of each are less than twenty-five (25) tons per year.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements for these emission units.

### Proposed Changes to the Part 70 Operating Permit

The following changes are the Administrative Amendment for this source (~~strikeout~~ added to show the deletions and **bold** to show the additions):



The description in Condition A.2 and in Section D.6 will be changed as follows:

- A.2 (6) Eleven (11) flexographic tail printers, identified as TP-48 and TP-49 and tuber machines No. 50 through **53, 55 through** 58, utilizing water based inks, with a maximum line speed of two hundred fifty (250) feet per minute and a maximum print width of twenty-eight (28) inches, **identified as tuber machine No. 54, utilizing water based inks, with a maximum line speed of two hundred fifty (250) feet per minute and a maximum print width of twenty-four (24) inches**, exhausting to the plant atmosphere.

#### SECTION D.6 FACILITY OPERATION CONDITIONS

Eleven (11) flexographic tail printers, identified as TP-48 and TP-49 and tuber machines No. 50 through **53, 55 through** 58, utilizing water based inks, with a maximum line speed of two hundred fifty (250) feet per minute, each, and a maximum print width of twenty-eight (28) inches, each, **identified as tuber machine No. 54, utilizing water based inks, with a maximum line speed of two hundred fifty (250) feet per minute and a maximum print width of twenty-four (24) inches**, exhausting to the plant atmosphere.

#### Conclusion

This administrative amendment shall be subject to the conditions of the attached Part 70 Permit No. 007-14563-00010.